

Exhibit 20

Guzman, Daniel

From: Munno, M. William <munno@sewkis.com>
Sent: Thursday, April 28, 2016 12:58 PM
To: 'adam.cooper@citadelgroup.com'
Cc: top@chapman.com; Weitnauer, Kit; Jason Solomon (jason.solomon@alston.com); 'Kraut, Michael S.'; Dennis Drebsky; 'timothy.pillar@usbank.com'; 'Brad Zwetzig'; 'Adam Scozzafava'; 'Thomas Musarra'; Munno, M. William
Subject: RMBS Trustees Request for Covered Loans in the Covered Trusts: In re Lehman Brothers Holdings Inc. - Case No. 08-13555
Attachments: Servicer Loan Request_01.20.2016 -- Bridgefield Mortgage.xlsx; Order re Protocol dated Dec. 29, 2014.pdf
Importance: High

Dear Mr. Cooper:

The RMBS Trustees – U.S. Bank National Association, Law Debenture Trust Company of New York, Wilmington Trust Company, Wilmington Trust, National Association, and Deutsche Bank National Trust Company – request Citadel’s help to retrieve recently identified loan files that had been serviced by ResMAE, which Citadel acquired in 2007. A list of the 751 loans is attached.

Time is of the essence. The RMBS Trustees are facing a Court-ordered deadline of May 31, 2016 to retrieve, review and submit to Lehman all the loan files that have a material breach of a representation and warranty. The Trusts’ claims for loans with breaches will be barred unless submitted by May 31, 2016, at the latest. We attach the Court Order with the Court-ordered Protocol under which the RMBS Trustees are operating

We are available to discuss any issues. You can reach me at 212-574-1587.

During a hearing, Judge Chapman emphasized that the Court [has the ability] to order parties to [pro]duce documents (Tr. at 357:22-23) and that “The files have to move.” *Id.* at 350:25.

The Court ordered (Order at 5):

ORDERED that the primary and master servicers for the Covered Loans from whom the RMBS Trustees and the Plan Administrator seek applicable documents and records in connection with the implementation of the RMBS Protocol shall promptly respond to the RMBS Trustees’ and the Plan Administrator’s reasonable document and file requests; and it is further

The Court-ordered Protocol specifies (at section I(e)):

e. If any or all of the primary servicers are not promptly providing the requested files, the RMBS Trustees shall promptly request that the Bankruptcy Court order the production of the files. The Plan Administrator shall reasonably cooperate with and support such request.

Please arrange to provide the loan files – origination files and servicing files – on a rolling basis with the latest delivery by May 19, 2016 so the RMBS Trustees’ five review firms, who have been engaged for this task, can review them.

Again, please call me with any questions

Thank you.

M. William Munno
Seward & Kissel LLP
212-574-1587

Enclosures: Order with Ordered Protocol
List of Loans